

To: RBC Planning, fao Louise Waters
Thursday 18th July 2024

Re RU.24/0251: Axon Centre Church Road Egham

Dear Ms Waters,

The Egham Residents' Association (ERA) objects to this planning application RU.24/0251 for demolition of the Axon Centre office building and erection of a 6-storey retail + student accommodation block in Church Road, Egham.

We object on grounds of:

- the bulk and height of the proposed building,
- the positioning of the proposed frontage,
- the carbon-emission profligacy of the demolition and re-building,
- the felling of urban trees across the site.
- no parking provision (for 186 student residents)
- adverse impacts, including on School Lane neighbouring residents

We urge the Council to refuse the application as it stands and to work with the developer to prepare plans of a higher quality, more appropriate for modern-day demands and concerns, and respecting the prominent position this site occupies on the edge of Egham's town centre.

We are disappointed that the developer didn't conduct effective prior consultation with the community. Despite the claim of engagement with community organisations in Section 2.54, the Egham Residents' Association was unaware of the plans until they were posted on the RBC website as a submitted Application.

Bulk and height of the proposal

Section 2.21 of the proposal proclaims: "*.... consideration has been given to the design, positioning, height, footprint, floor area and massing of the building, and as a result, the proposed development does not result in a building of much greater prominence within the street scene when compared to the existing building, and also taking local context into consideration*".

We take the diametrically opposite view, considering that:

- The proposal footprint (ground floor 2295 m²) engulfs the verges and much of the back yard adjacent to the existing building, with the result that it largely covers the property site. The proposal is more than double the current footprint (1080 m²).
- The proposal is for six stories *versus* the existing three, approximately double the existing height. The height of the proposed 6 stories approaches 20 m above ground level for much of the building, with a maximum exceeding 23 m.
- The enclosed bulk (volume) of the proposed building is therefore more than four times the existing building. Four times the bulk is four times the prominence.

So we disagree with the proposal claim (Section 2.22) that "*the proposed development is not overly dominant, overbearing or harmful to the established character of the area ...*".

Similarly we are amazed at the suggestion (Section 4.32) that "*.... The proposed development has been designed in relation to scale, mass, bulk, height to reflect and respect the wider local area*".

We disagree with the yardstick taken for the 'local context' and 'the wider local area' for arriving at an acceptable building height. The proposal makes numerous allusions to the acceptability of six-stories at the Axon Centre site by reference (eg Section 5.47) to "*... the recent Magna Square development ... with buildings extending to 7 storeys.*"

We challenge this point of reference. The student block 'Parish Hall' (5 stories) is the relevant comparator. Parish Hall was carefully designed to give a gradient to the roofscape along Church Road away from the 7-story culmination point of Gem House at the south end of Magna Square. Axon Centre lies beyond. The roofscape gradient should continue falling away from the centre. On this basis we suggest the Axon Centre

site should be allowed a maximum of 4 stories. We strongly object to the proposal for a six-story building here.

The proposal frontage

Plans show the front of the proposed building extending tight up to the property boundary with the High Street, with the pavement itself missing. This is surely a mistake, but the pavement here is narrow, barely more than a single stride. Can this narrow pavement be expected to accommodate footfall for a supermarket-sized store as well as 186 residences? We say no. If another accommodation block is to be built, the frontage should be set back, like the Parish Hall student block opposite, which was much more considerately designed with a wide pedestrian approach/frontage, which works well.

Carbon-emissions and energy use

The NPPF directs that *"The planning system should support the transition to a low carbon future in a changing climate in ways that contribute to radical reductions in greenhouse gas emissions ... encourage the reuse of existing resources, including the conversion of existing buildings; and support ... low carbon energy ..."*. This direction is quoted by the applicant (Section 4.33) but is otherwise ignored. The applicant has been alarmingly negligent regarding the carbon budget of the proposal. There are no estimates for carbon emissions. Emissions embedded in demolition of the recently-built (1999) office block are entirely ignored. The Demolition and Construction Environmental Management Plan is silent on the issue, and there is no attempt at C-neutrality for the operational phase of the proposal. [Energy 'savings' are quoted both in MWhr and % C-reduction, but not as absolute amounts. The claim for a 30% C-reduction from roof mounted Solar PV is therefore misleading. It's unclear what the comparison is with, but it's certainly NOT with the C-emissions of the current (office) useage.]

We also find the vain boast that *"a minimum 10% of the energy needs of the proposed development are derived from renewable, low carbon or decentralised sources"* to be complacent and entirely insufficient.

Trees

We deplore the proposed felling of 23 trees across the site. The 16 semi-mature boundary trees provide a valuable screening amenity, a contribution to carbon sequestration, and a mitigation against poor air quality. Urban trees are especially valued in Egham in their own right, given the relative paucity of our tree-scape. Groups of urban trees such as those on the Axon site are small refuges for birds and associated wildlife in what is otherwise devoid of nature. To sacrifice the boundary trees for greater building mass causes particular offense. We urge the Council to protect the urban trees on this site, either via requiring a modification of the plans or by refusing the application.

Parking

Has the Council estimated the possible impacts of the proposal on car parking in the locality? There is no on-site parking provision for the proposed student accommodation. It's a reasonable assumption that in general the majority of students do not run a car, but we think it entirely unreasonable not to anticipate that from 186 students a small number may need/want occasional use of a car. The application should include space for car-club cars, and arrangements for this should be required in an improved application.

Adverse impacts, including on School Lane neighbouring residents

Impacts on the neighbouring residents of School Lane will be adverse. With the application building being closer to the boundary, the 24x7 residential use of the building (*versus* daytime hours, office use), and the tree-felling removal of the noise reduction barrier, the change in noise profile will be detrimental for these residents.

The change in use also has an opportunity cost for continued business use of the site.

For all these reasons we ask that the application in its present form be refused.

Yours sincerely,

William Burgess, Chair: Egham Residents' Association (ERA, c/o 35 Crown Street, Egham, Surrey)